

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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(404) 657-8600; Fax (404) 657-0807

Judson H. Turner, Director

October 14, 2014

FILE COPY

PM, Ltd
c/o Ms. Nancy Shannon
Suntrust Bank
25 Park Place, 2nd floor
Atlanta, Georgia 30303

RE: September 8, 2014 Monitoring and Maintenance (M&M)
Plan Groundwater Monitoring Event #1 Report
Former Imperial Cleaners
1233B Alpharetta Highway, Roswell, Fulton County, GA
HSI Site No. 10690 / VRP978375182
Tax Parcels: 12-1993-0450-063-5 and 12-1993-0450-062-7

Dear Ms. Shannon:

The Georgia Environmental Protection Division (EPD) has reviewed the subject submittal for HSI 10690/VRP 978375182 known as the Former Imperial Cleaners facility in Roswell, Fulton County, Georgia. The subject submittal was prepared and submitted by AMEC Environment & Infrastructure, Inc. (AMEC) on behalf of PM, Ltd, (PML). EPD is providing the following comments in regard to the subject document:

1. Please note that only one paper copy of submittals greater than 25 pages total are required with two electronic copies. EPD received two paper copies of the subject submittal with two electronic copies on compact discs (cds). Furthermore, the signed certification page referenced in Comment #4c of the February 5 2014 EPD letter issued to your attention was missing. Please see the attached memo regarding submittal requirements for documents 25 pages or more and insure that all requirements are met for the subject and future submittals.
2. Please ensure that groundwater contaminant concentration trend graphs referenced in Comment #4b of the February 5, 2014 EPD letter are submitted in future monitoring reports and the final VRP compliance status report (CSR) for the subject site/property. Furthermore, the detected concentrations of groundwater contaminants of concern (COCs) must be compared to the maximum allowable concentrations at the groundwater discharge location to Hog Wallow Creek in the text, groundwater analytical summary table(s), and groundwater COC concentration graphs in future submittals as stated in the referenced EPD comment.
3. Several required pieces of information are missing from the well purging/sampling field records provided as Appendix B of the subject submittal. Consequently, EPD is unable to evaluate purging and groundwater sampling procedures employed by field personnel or the validity of the groundwater analytical results for the June 2014 groundwater sampling event. Please refer to Comment #4.a.i. of the February 5, 2014 EPD letter for a list of information that must be provided in groundwater purging and sampling field records in future submittals.
4. Please provide a paper and electronic copy of the final M&M Plan referred to in the subject submittal for files maintained by EPD. EPD only received and reviewed what they assumed was a draft copy sent *via* email to Ms. Carolyn Daniels of my office. Draft copies are not retained in site files maintained by EPD. Furthermore, a copy of the final environmental covenant as posted with the property deed with Fulton County, which references the M&M Plan, has not been provided to EPD. Please submit said documentation with the next groundwater monitoring report.
5. **Risk Reduction Standards (RRS):** The revised Table 8 in the Addendum to the subject submittal is still incorrect.
 - a. The applicable Type 5 RRS for PCE in soil as calculated by AMEC is 890 µg/kg, not the 1,200 µg/kg shown on the revised table. However, since source material, including impacted soil, is to be addressed by the new property owners under the Georgia Brownfields Act in accordance with an approved Prospective Purchaser Corrective Action Plan, a comparison of soil analytical results to approved RRS is not necessary in future groundwater monitoring reports. However, the final CSR should refer to soil compliance with applicable RRS based on corrective measures completed by the new owner.

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- b. RRS were calculated by AMEC, and concurred with by EPD, for acetone and toluene in groundwater and were not included on the revised table. Future submittals must determine groundwater compliance with the applicable RRS for said substances on tables and figures summarizing analytical results and in the associated narrative at a minimum. Note: Chloroform and styrene analytical results are summarized on Table 1 of the subject submittal for which chloroform has not been detected since March 14, 2002 and styrene as never been detected in groundwater samples collected since July 2000. However, neither acetone nor toluene results are summarized although acetone has been detected in soil and toluene was detected in groundwater at a concentration of 94 µg/L at monitoring well MW-11R during the June 2014 monitoring event. Please remove the chloroform and styrene groundwater analytical results and add groundwater analytical results for acetone and toluene on tables summarizing groundwater analytical results in future submittals.

EPD will not require a separately submitted response to the above comments; however, future submittals will be reviewed and evaluated based on how well they address said comments. EPD looks forward to receiving the next groundwater monitoring report. Based on the most recent sampling date of June 27, 2014, EPD expects the next semi-annual groundwater monitoring event to be conducted in late December 2014 with submittal of the associated report no later than March 1, 2015, approximately 60 days after completion of groundwater sampling.

If you have any questions regarding this letter or the subject VRP site in general, please contact Carolyn L. Daniels, P.G. of my office at (404)657-8646.

Sincerely,



David Reuland
Unit Coordinator
Response and Remediation Program

Attachment: Electronic Submittal Memo

- c: Joan Sasine, Esq., Bryan Cave (paper and email)
Stephen R. Foley, P.G., AMEC Environment & Infrastructure, Inc. (email only)
Charles T. Ferry, P.E., AMEC Environment & Infrastructure, Inc. (paper and email)

File: 261-0571, VRP

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Response and Remediation Program Document Submittal Format

All documents more than 25 pages in length shall be submitted as one paper copy and two compact disc (CD) copies with the documents in searchable (i.e., tagged) Portable Document Format (PDF). A signed certification page must be included in the CD copies. The certification page states that the electronic copy is complete, identical to the paper copy, and virus free.

All documents currently in electronic format should be converted into the searchable PDF format. All documents not available electronically and pages that contain signatures, initials, or other information not in the electronic copy should be scanned into a searchable PDF format including the signed certification page. Scanning should be at 200 dpi with any documents requiring color being scanned in color.

The document should be broken down into multiple searchable PDF files along the following guidelines with the file name referenced in the table of content.

Table of Contents

Signature / Certification pages

Main body of document

Each Attachment (Appendices, Tables, Figures, Reports, etc.)

For ease of posting on EPD's web page, all Voluntary Remediation Program CD submittals should also contain the entire document in a single PDF file, identical to the paper copy, in addition to the multiple searchable PDF files listed above.

The CDs shall be enclosed in a jewel case. The CD shall be labeled with the following information written on the CD in indelible ink or affixed to the CD with an adhesive CD label.

Site Name

Site Address

HSI Number

City

County

Document Name

Document Date

